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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LOUISIANA MUNICIPAL POLICE
EMPLOYEES' RETIREMENT SYSTEM,
Derivatively on Behalf of the Nominal Defendant
Wynn Resorts, Limited,

Plaintiff,

v.

STEPHEN A. WYNN, LINDA CHEN, RUSSELL
GOLDSMITH, RAY R. IRANI, ROBERT J.
MILLER, JOHN A MORAN, MARC D.
SCHORR, AVLIN V. SHOEMAKER, D. BOONE
WAYSON, ELAINE P. WYNN, and ALLAN
ZEMAN,

Defendants.

—and—

WYNN RESORTS, LIMITED, a Nevada
Corporation,

Nominal Defendant.

**No. 2:12-CV-00509-JCM-
(GWF)**

**PLAINTIFFS' MOTION
FOR EXTENSION OF TIME
TO FILE MOTION TO
AMEND COMPLAINT AND
PROPOSED AMENDED
COMPLAINT**

(FIRST REQUEST)

1 Plaintiffs Louisiana Municipal Police Employees' Retirement System,
2 Boilermakers Lodge No. 154 Retirement Fund, Maryanne Solak, and Excavators
3 Union Local 731 Welfare Fund (collectively "Plaintiffs") respectfully file this Motion
4 for Extension of Time to File Motion to Amend Complaint and Proposed Amended
5 Complaint.

6 Dated: March 4, 2013

Respectfully submitted,

7
8 By: /s/ John P. Aldrich
9 John P. Aldrich, Esq.
10 ALDRICH LAW FIRM, LTD.
11 1601 S. Rainbow Blvd. Suite 160
12 Las Vegas, Nevada 89146
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15 **I. MEMORANDUM OF POINTS AND AUTHORITIES**

16 On August 6, 2012, Plaintiffs filed a Verified Consolidated Derivative
17 Complaint. On September 14, 2012, Defendants filed a Motion to Dismiss. Several
18 of the Defendants filed Joinders to the Motion to Dismiss. Plaintiffs' opposed the
19 Motion and Joinders. On February 1, 2013, the Court issued an Order granting
20 Defendants' Motion to Dismiss the Consolidated Derivative Complaint and directing
21 Plaintiffs to file a Motion to Amend pursuant to Local Rule 15-1 annexing their
22 Proposed Amended Verified Consolidated Derivative Complaint within thirty (30)
23 days from the date of that Order. Plaintiffs' Motion to Amend pursuant to Local Rule
24 15-1 and Proposed Amended Verified Consolidated Derivative Complaint are
25 currently due on March 4, 2013.

26 Pursuant to FRCP 6(b), a party is entitled to request an extension of a deadline.
27 As required by Local Rule 6-1, this is the first request for extension of time to file
28 Plaintiffs' Motion to Amend. Plaintiffs' counsel and Defendants' counsel engaged in

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1 discussions that would allow for an extension of time, along with a proposed briefing
2 schedule in the event the Motion to Amend is granted.

3
4 Consequently, Plaintiffs and Defendants, through their respective counsel, have
5 agreed to (1) extend Plaintiffs' time for filing their Motion to Amend by fourteen (14)
6 days and, in the event the Court grants Plaintiffs' Motion to Amend, (2) establish a
7 briefing schedule for Defendants' Motions to Dismiss the Amended Verified
8 Consolidated Derivative Complaint. The parties agreed to and submitted the proposed
9 Stipulation and Order on March 1, 2013 [#123], but as of close of normal business
10 hours on March 4, 2013, the Court had not yet approved and signed the Order. In
11 order to avoid expiration of the deadline to file a Motion to Amend, Plaintiffs file the
12 instant Motion.

13 **II. CONCLUSION**

14 For the foregoing reasons, Plaintiffs respectfully request that the Court grant its
15 Motion for Extension of Time to File Motion to Amend Complaint and Proposed
16 Amended Complaint.

17 Dated: March 4, 2013

Respectfully submitted,

18
19 By: /s/ John P. Aldrich

John P. Aldrich, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

/s/ John P. Aldrich
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